



Whistleblowing Policy

Part of the BYO Governance and Compliance Policy Suite

Britannia Youth Organisation CIC is a Community Interest Company registered in England and Wales.
Company No. 12515346 | Registered Address: 36 St Joseph's Rd, Ward End, Birmingham, B8 2JU

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1. Introduction

The Britannia Youth Organisation CIC (BYO) is committed to creating a safe, transparent, and accountable environment in which all those involved in the organisation are able to raise concerns about unacceptable practice and misconduct, including the behaviour of an adult towards a young person.

BYO operates under the highest ethical standards and expects all individuals associated with the organisation to act with integrity. We recognise that all of us have a responsibility to speak up about wrongdoing that could harm our young people, our organisation, or the wider public interest.

This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with. **It provides multiple, accessible routes for reporting concerns and ensures robust protection for those who speak up in good faith.**

This policy applies to all employees, Directors, workers, volunteers, contractors, agency workers, and any other individuals performing functions in relation to BYO. It also covers concerns about third parties such as suppliers, partners, or other organisations we work with.

2. Distinguishing from Other Policies

Whistleblowing vs. Complaints:

- **Whistleblowing** concerns serious wrongdoing that affects the public interest or organisational integrity
- **[Complaints Policy]** deals with service delivery issues and personal grievances
- **When in doubt, report the concern** - we will determine the appropriate route

Safeguarding Reporting:

- **Immediate safeguarding concerns** should be reported directly to the DSL following **[Child Protection Procedures]**
- **Systemic safeguarding failures** or concerns about safeguarding practices fall under whistleblowing
- **Both routes are protected** and concerns may be escalated between them as appropriate

See also: *[Complaints Policy]* for service-related concerns and *[Child Protection Procedures]* for immediate safeguarding reporting.

3. Our Commitment

BYO is committed to:

- **Maintaining the highest standards of openness, probity, and accountability**
- Providing simple, secure, and accessible mechanisms to raise concerns
- **Ensuring multiple reporting routes are available to suit different circumstances**
- Recording concerns confidentially and securely
- Investigating concerns promptly, fairly, and thoroughly whilst maintaining objectivity and confidentiality
- **Providing robust protection against retaliation for those who speak up in good faith**
- Providing individuals with an opportunity to remain anonymous where possible
- Providing the right to be accompanied for any meetings in relation to their concerns
- Keeping individuals informed throughout investigations, where appropriate and possible
- **Learning from concerns raised to improve our practices and prevent future issues**
- **Taking appropriate action based on investigation findings**

4. Types of Concerns Covered

This policy covers any actions, omissions, or circumstances that you reasonably believe to be:

Safeguarding and Child Protection

- Any form of abuse or neglect of a young person
- Inappropriate behaviour towards young people
- Failure to follow [Child Protection Procedures] or [Safeguarding Policy Framework]
- Concerns about an individual's suitability to work with young people
- Systemic failures in safeguarding practices
- Concerns about DBS processes or decisions (see also [Vetting and DBS Policy])

Criminal Activity

- Conduct which is an offence or a breach of law
- Fraud, theft, bribery, or corruption
- Modern slavery, servitude, forced or compulsory labour, and/or trafficking

Health, Safety, and Welfare

- Imminent health and safety risks to young people, staff, volunteers, or the public
- Failure to comply with health and safety obligations
- Risk of physical or psychological harm
- Damage to the natural environment

Financial and Governance Issues

- Improper or unauthorised use of BYO funds, resources, or time
- Financial irregularities or mismanagement
- Breach of fiduciary duties
- Conflicts of interest that are not properly managed

Regulatory and Compliance Matters

- Failure to comply with legal obligations or regulatory requirements
- Breach of charity law or Companies House requirements
- Non-compliance with funding requirements or conditions
- Breaches of [Data Protection Policy] or other organisational policies

Organisational Conduct

- Unethical or improper conduct that breaches BYO policies or procedures
- Bullying, harassment, or discrimination (see also [Equality, Diversity and Inclusion Policy])
- Improper use of authority or abuse of position
- Actions contrary to BYO's values and mission
- Breaches of [Code of Conduct for Staff and Volunteers]

Cover-up Activities

- Deliberate concealment of any of the above matters
- Attempts to suppress legitimate concerns
- Destruction of evidence

If you have concerns about a third party (such as a supplier, partner organisation, or other external body), you should still report this using the procedures outlined in this policy.

5. How to Report Concerns

Multiple Reporting Routes Available

We understand that different circumstances require different approaches. You can report concerns through any of the following routes:

Route 1: Line Management

When to use: For most concerns where you feel comfortable speaking to your immediate supervisor.

- **Raise concerns with your direct line manager**
- They will work with you to address the concern and escalate as appropriate
- **All concerns will be reported to The Governor regardless of how they are initially raised**

Route 2: Senior Leadership

When to use: When you don't have a line manager, feel uncomfortable speaking to them, or believe they may be involved in the wrongdoing.

- **Contact any member of BYO's Senior Leadership Team**
- **Contact BYO's Directorate directly**
- **Contact The Governor directly**

Route 3: Designated Contacts

When to use: For specific types of concerns or when you want to speak to a designated specialist.

For Safeguarding Concerns:

- **Contact the Designated Safeguarding Lead immediately**
- **Joshua William Hall: 07925 328 728**
- **Email: joshuahall@britanniayo.com**
- **Deputy DSL: Hassan Alexander Kingsley: 07597 874 222**
- **Available for urgent safeguarding matters**

Note: For immediate safeguarding concerns, also follow **[Child Protection Procedures]** for comprehensive reporting guidance.

For General Whistleblowing:

- **The Governor: Hassan Alexander Kingsley**
- **Email: hassankingsley@britanniayo.com**
- **Address: 36 St Joseph's Road, Ward End, Birmingham, B8 2JU**

Route 4: Anonymous Reporting

When to use: When you prefer to remain anonymous or fear retaliation.

- Anonymous written reports can be sent to the above addresses
- Anonymous reports will be taken seriously and investigated where possible
- Consider providing a way for us to contact you securely if we need more information

Route 5: External Reporting

When to use: When internal routes are inappropriate or have not resulted in satisfactory action.

Regulatory Bodies (depending on the nature of concern):

- **Charity Commission** (charity governance and compliance)
- **Ofsted** (if applicable to our activities)
- **Local Authority Designated Officer (LADO)** (safeguarding concerns)
- **Police** (criminal matters)
- **HM Revenue & Customs** (tax matters)
- **Health and Safety Executive** (health and safety matters)
- **Environment Agency** (environmental concerns)
- **Financial Conduct Authority** (financial services matters)
- **Serious Fraud Office** (serious fraud)
- **Information Commissioner's Office** (data protection)

Written vs Verbal Reports

You can raise concerns either verbally or in writing. However, we encourage written reports as they:

- Provide a clear record of your concerns
- Help ensure important details are not missed
- Allow for more thorough investigation

If reporting verbally:

- A written record will be made of your concern
- You will be asked to verify the accuracy of this record
- You may be asked to provide a written statement later

Information to Include

When reporting a concern, please provide as much detail as possible:

- **What happened?** (specific incidents, dates, times, locations)
- **Who was involved?** (names, roles, descriptions)
- **When did it happen?** (dates and times)
- **Where did it happen?** (specific locations)
- **Who else knows about it?** (potential witnesses)
- **What evidence exists?** (documents, emails, photos, etc.)
- **Has it been reported before?** (to whom and when)
- **Is it still happening?** (ongoing vs historical concerns)
- **What action do you think should be taken?**

Don't worry if you don't have all this information - report what you know and we will investigate further.

6. Confidentiality and Anonymity

Confidentiality

- **Your identity will be kept confidential wherever possible**
- Information will only be shared on a 'need to know' basis
- **We may need to disclose your identity in certain circumstances** (e.g., if required by law or for a fair investigation)
- **You will be informed before your identity is disclosed, where possible**

Anonymous Reporting

- **Anonymous reports are welcome and will be taken seriously**
- **However, named reports allow for:**
 - More thorough investigation
 - Better protection for the reporter
 - Feedback on outcomes
 - Clarification of details if needed

Factors considered for anonymous reports:

- Seriousness of the issues raised
- Credibility of the concern and evidence available
- Likelihood of confirming the allegation from other sources
- **Potential risk to young people or others**

*All confidential information handled in accordance with **[Data Protection Policy]** requirements.*

7. Protection and Support

Legal Protection

The law protects workers who make qualifying disclosures in good faith. This means you are protected from:

- Dismissal or redundancy
- Disciplinary action
- Harassment, bullying, or victimisation
- Any other detriment at work

This protection applies even if your concern is not substantiated after investigation, provided it was raised in good faith.

BYO's Protection Commitment

- We will not tolerate any retaliation against those who raise legitimate concerns
- We will take disciplinary action against anyone who retaliates
- We will monitor for signs of retaliation and act quickly if identified
- We will provide support throughout the process

What to Do if You Experience Retaliation

If you believe you are being subjected to any detriment as a result of raising concerns:

- Report it immediately to The Governor
- If The Governor is involved, report to the Chair of Trustees/Board
- Keep records of the retaliation
- Seek support from trade union representatives if applicable

Support Available

- Emotional support and counselling if needed
- Regular updates on investigation progress (where possible)
- Assistance with any workplace issues arising
- Access to independent advice if required

Right to be Accompanied

- You have the right to be accompanied to any meetings
- Your companion can be a colleague, trade union representative, or friend
- Your companion must respect confidentiality requirements
- We encourage you to bring support, especially for difficult concerns

8. Investigation Process

Initial Response

Within 5 working days (or immediately for urgent **safeguarding** concerns):

- Acknowledgement of your concern
- Initial risk assessment
- Decision on investigation approach
- Information about support available
- Estimated timescales

Investigation Planning

Within 10 working days:

- Detailed investigation plan developed
- Resources allocated
- External expertise engaged if needed
- You will be informed of the approach (where possible)

Investigation Methods

Depending on the nature of the concern, we may:

- Conduct internal investigation
- Engage external investigators
- Refer to police
- Refer to regulatory bodies
- Commission independent inquiry
- Take immediate protective action
- Follow [Managing Allegations about Staff and Volunteers] procedures for staff-related concerns

Investigation Principles

- Thorough and impartial
- Conducted by appropriately skilled persons
- Free from conflicts of interest
- Completed in reasonable timeframes
- Properly documented
- Based on evidence and facts

Feedback and Updates

- Regular updates on progress (where possible and appropriate)
- Information about external referrals (where appropriate)
- Outcome communicated (subject to confidentiality constraints)
- Action taken explained (where appropriate)

Timescales

- Acknowledgement: Within 5 working days
- Investigation plan: Within 10 working days
- Investigation completion: Varies by complexity but typically within 3 months
- Urgent concerns will be prioritised and may be escalated immediately

For **safeguarding** concerns, also follow timescales specified in **[Child Protection Procedures]**.

9. Outcomes and Actions

Possible Outcomes

- **Concern substantiated** - appropriate action will be taken
- **Concern partially substantiated** - action taken where appropriate
- **Concern not substantiated** - no evidence found but learning may be identified
- **Concern made in good faith but no wrongdoing found** - protected from detriment

Types of Action

Where concerns are substantiated, action may include:

- Disciplinary action against individuals
- Changes to policies and procedures
- Additional training and development
- Improved controls and monitoring
- Referral to regulatory bodies
- Referral to police
- Financial recovery action
- Apologies and remedial action

Learning and Improvement

- All concerns will be reviewed for learning opportunities
- Patterns and trends will be monitored
- Policies and procedures will be updated as needed
- Training needs will be identified and addressed
- Reporting will be made to governance bodies

10. Malicious or Vexatious Reports

While we encourage all legitimate concerns to be reported, we take seriously any reports made maliciously or vexatiously.

If an investigation concludes that a concern was raised:

- Maliciously
- Vexatiously
- In bad faith
- For personal gain
- Knowing it to be false

The individual making the disclosure may be subject to disciplinary action under BYO's Disciplinary Policy.

However, this will not apply where:

- The concern was made in good faith
- There was a reasonable belief in the truth of the allegation
- The concern was not substantiated but was genuinely held

11. Record Keeping and Monitoring

Records Maintained

- Register of all concerns raised
- Investigation files (securely stored)
- Outcomes and actions taken
- Monitoring data on patterns and trends
- Annual reporting to governance bodies

Data Protection

- All personal data processed in accordance with [Data Protection Policy]
- Information held securely and accessed only on a need-to-know basis
- Retention periods in line with legal requirements
- Rights of data subjects respected

Monitoring and Reporting

- The Governor monitors all whistleblowing activity
- Annual report to Board/Trustees on whistleblowing matters
- Regular review of policy effectiveness
- External reporting to regulators where required

12. Training and Awareness

Staff Training

- All staff and volunteers receive training on this policy
- Regular refresher training provided
- Specific training for managers on handling concerns
- Training records maintained

Awareness

- Policy prominently displayed and accessible
- Regular communication about the importance of speaking up
- Success stories shared (maintaining confidentiality)
- Clear message that speaking up is valued and protected

13. Policy Review

This policy will be reviewed:

- Annually as a minimum
- Following any significant incident
- When legislation or best practice changes
- Based on feedback and experience

Reviews will consider:

- Effectiveness of reporting mechanisms
- Timeliness of investigations
- Quality of outcomes
- Levels of retaliation (if any)
- Stakeholder feedback
- Legal and regulatory developments

14. Contact Information

Internal Contacts

Safeguarding Concerns:

- Designated Safeguarding Lead: Joshua William Hall
- Phone: 07925 328 728
- Email: joshuahall@britanniayo.com

Deputy DSL: Hassan Alexander Kingsley

- Phone: 07597 874 222
- Email: hassankingsley@britanniayo.com

General Whistleblowing:

- The Governor: Hassan Alexander Kingsley
- Phone: 07597 874 222
- Email: hassankingsley@britanniayo.com
- Address: 36 St Joseph's Road, Ward End, Birmingham, B8 2JU

External Contacts

For when internal routes are not appropriate:

- **Charity Commission:** 0300 066 9197
- **Police:** 999 (emergency) / 101 (non-emergency)
- **Local Authority Designated Officer (LADO):** 0121 675 1669
- **Ofsted:** 0300 123 1231
- **Health and Safety Executive:** 0300 003 1647
- **Information Commissioner's Office:** 0303 123 1113

Support Services

- **Citizens Advice:** 03444 111 444
- **ACAS:** 0300 123 1100
- **Protect (Whistleblowing Charity):** 020 3117 2520

Remember: Speaking up about wrongdoing is not disloyal - it shows your commitment to our young people, our organisation, and the public interest.

Document Control:

- This policy forms part of BYO's values-based approach to youth work
- All staff and volunteers receive training on equality and inclusion
- Regular monitoring ensures policy effectiveness and continuous improvement

Reviewed by:



Hassan Kingsley, Governor

Date: 17/06/2025

Next Review Date: 17/06/2026

This policy forms part of BYO's commitment to safeguarding and should be read alongside our complete Safeguarding Framework.

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